

United States District Court
Eastern District of New York

October 13, 2003

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William J. Higgins

Plaintiff

Case No.

02-CV-208 (ARR)(I.B)

MOTION

Against

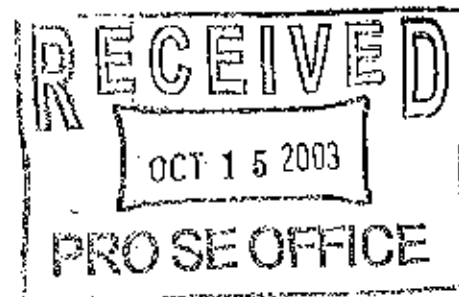
General Mills Inc. et al,

General Mills Inc. Board of Directors, Officers, Directors, Distributors et. al.

Progresso Quality Foods Company

Officers, Directors, Distributors et al

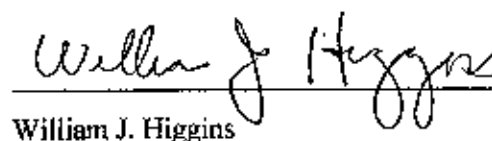
Defendants
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The plaintiff William J. Higgins at this instant moment requests and moves this Honorable Court, the Honorable Judge Lois Bloom, the Honorable Judge Allyn Ross to issue an immediate Court Order to halt all actions including Discovery Depositions etc. and move End Date for Discovery from November 17, 2003 to December 17, 2003. This is necessary to obtain additional Discovery of defendants in Interrogatories, Requests for Production of Documents, change in defendants witnesses to be deposed orally and to now deal with defendants Notice of Removal filed October 10, 2003 to attempt to remove plaintiff's action from New York State Supreme Court. This Motion/Request by plaintiff is extremely reasonable and is only second delay requested by plaintiff. It is a matter of fact that defendants have not provided reasonable and in fact little if any information at this date to plaintiff to look to end the Discovery by November 17, 2003. The plaintiff moves this court by this Motion to order immediately a 30 Day Extension to complete Discovery and to prepare to counter defendants Notice of Removal of removal of New York State Supreme Court Actin filed by plaintiff September 17, 2003 Index No. 33710/03.

The plaintiff respectfully thanks the court and Judges for granting additional time to December 17, 2003 to complete Discovery and respond to Notice of Removal filed by defendants October 10, 2003. This plaintiff working Pro Se has been denied virtually all information sought from defendants and needs 30 additional days to complete Discovery, moving Oral Depositions back two weeks and pursue avenues to counter defendants Notice of Removal filed October 10 in the United States District Court.

Dated: October 13, 2003

A handwritten signature in cursive script, reading "William J. Higgins", written over a horizontal line.

William J. Higgins

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